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**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

MARIA VICTORIA PEREZ and KAELA R.M.  
BROWN, individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

ALLSTATE INSURANCE COMPANY,

Defendant.

**11-CV-1812 (AMD) (AKT)**

**PLAINTIFFS' NOTICE OF  
UNOPPOSED MOTION FOR  
PRELIMINARY APPROVAL  
OF SETTLEMENT,  
PROPOSED NOTICE OF  
SETTLEMENT AND CLASS  
ACTION SETTLEMENT  
PROCEDURE**

For the reasons set forth in the Memorandum of Law in Support of Plaintiffs' Unopposed Motion for Preliminary Approval of Settlement, Proposed Notice of Settlement and Class Action Settlement Procedure, and the supporting Declaration of Juno Turner ("Turner Declaration"), and the exhibits attached thereto, Plaintiffs respectfully move this Court for an Order:

- (1) Preliminarily approving the Joint Agreement of Settlement and Release, attached to the Turner Declaration as Exhibit A;
- (2) Approving the Proposed Notice of Proposed Settlement of Class Action Lawsuit and Fairness Hearing and Proposed Notice of Collective Action Settlement;
- (3) Approving the proposed schedule for distribution of notice and final settlement approval; and
- (4) Granting such further relief as the Court deems just and proper.

Dated: July 2, 2018  
New York, New York

Respectfully submitted,

**OUTTEN & GOLDEN LLP**

By:

/s/ Juno Turner

**OUTTEN & GOLDEN LLP**

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*Attorneys for Plaintiffs, the Class, and the  
Collective*